Regarding the §102(e) rejection of claims 21-67, it is well-established law that "[a] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." See, e.g., *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987). See also, M.P.E.P. §2131. Applicants assert that Bates fails to teach or suggest each and every element respectively recited in claims 21-67 and, thus, the §102(e) rejection of claims 21-67 based on Bates clearly fails to meet the above legal requirements for anticipation. Support for this assertion is as follows.

The present invention, for example, as recited in independent claim 1, comprises a technique for enriching a non-linkable media representation presentable at a user terminal, comprising the steps of: (i) obtaining the non-linkable media representation; (ii) obtaining code and, responsive to the code, generating a panel comprising at least one link to at least one other media representation; and (iii) overlaying the panel on the non-linkable media representation in accordance with a presentation at the user terminal, such that the non-linkable media representation becomes linkable to the at least one other media representation. Independent claims 44, 63 and 67 recite similar elements.

As explained, for example, at page 3 of the present specification, instances of rich media often incorporate links to other presentations to expand a user experience. The process of clicking on a link in the media for transfer to another presentation is referred to as "hyperlinking" or "hotlinking." However, sometimes rich media is non-linkable to other presentations. The claimed invention provides a solution to this problem by providing techniques that generate "a panel comprising at least one link to at least one other media representation," and overlay "the panel on the non-linkable media representation in accordance with a presentation at the user terminal, such that the non-linkable media representation becomes linkable to the at least one other media representation," as recited in independent claims 21, 44, 63 and 67.

The icon generation techniques of Bates disclose nothing about links and non-linkable or linkable media representations. That is because Bates deals with a completely different problem. As explained in Bates at column 1, line 48, through column 2, line 12, a user can create multiple instances, or invocations, of a browser, each simultaneously running in a window on the display screen and each displaying a web page. Since space on a display screen is limited, the user may

choose to minimize one or more of the browser instances. Minimizing a browser creates an icon, which is a small image--plus minimal, associated text--that represents the browser. In the future, when the user wishes to see the web page again, the user can select the icon using a mouse or other pointing device, which causes the browser and its web page to be restored to full view. Over time, the user may accumulate many icons, which can be small and not easily distinguishable, especially because the images in each browser icon are identical since the icon represents the browser and not the web page. Thus, users often spend much time squinting at small icons, trying to remember which icon is associated with which web page or window. Thus, Bates creates icons that are more easily distinguishable.

As is evident, Bates is unrelated to the claimed concept of enriching a non-linkable media representation presentable at a user terminal. An icon is not the same as a link. A browser instance being minimized into an icon is not the same as enriching a non-linkable media representation such that the non-linkable media representation becomes linkable to the at least one other media representation. Thus, Bates fails to teach or suggest anything about a "non-linkable media representation" or "obtaining code and, responsive to the code, generating a panel comprising at least one link to at least one other media representation" or "overlaying the panel on the non-linkable media representation in accordance with a presentation at the user terminal, such that the non-linkable media representation becomes linkable to the at least one other media representation," as recited in the claimed invention.

The Office Action cites the Abstract and columns 8 and 9 of Bates in support of the rejection. However, nothing in these portions of Bates, nor any other portion of Bates, teach or suggest enriching a non-linkable media representation, as in the claimed invention.

For at least the above reasons, withdrawal of the §102(e) rejection of independent claims 21, 44, 63 and 67 is respectfully requested.

Regarding dependent claims 22-43, 45-62 and 64-66, Applicants assert that said dependent claims are patentable over Bates, not only due to their respective dependence on independent claims 21, 44 and 63 and for the reasons given above, but also because such dependent claims recite patentable subject matter in their own right.

Such dependent claims are respectively directed toward many additional features of the non-linkable media representation enriching technique of the invention.

For example, the non-linkable media representation and the code may be obtained by the client station from at least one server via a network (claims 23 and 45). The Office Action cites figure 4 of Bates which shows a client and a server, however, the Office Action fails to indicate exactly how this teaches or suggests a server providing a non-linkable media representation and the code to a client station. Applicants assert that this does not teach or suggest these features.

Further, the code may instantiate a link canvas object at the client station, wherein the link canvas object generates the panel (claims 24 and 46). The client station may obtain an action enabling kernel from the server (claims 25 and 47). The Office Action cites figures 7-10 of Bates, but again, fails to indicate how this teaches or suggests the claimed features. Applicants assert that they do not teach or suggest these features.

Still further, the link canvas object may query the non-linkable media representation for status (claims 26 and 48). The link canvas object may forward the status of the non-linkable media representation to the action enabling kernel (claims 27 and 49). The link canvas object may receive one or more link candidates from the action enabling kernel (claims 28 and 50). The Office Action summarily states that "claims 26-28 are analyzed as previously discussed with respect to claims 22-25 above." However, claims 26-28 recite unique features that are not expressly recited in claims 22-25 and are not mentioned at all with regard to the rejection of claims 22-25. So it is unclear how this provides support for the rejection of claims 26-28. Applicants assert that there is no support in Bates for rejecting these features.

Also, the link canvas object may select a link from the one or more link candidates, the selected link being the at least one link (claims 29 and 51). The link canvas object may compose the at least one link in response to meta data received from the server via the action enabling kernel (claims 30 and 52). Again, the portion of Bates cited in the Office Action (column 14, lines 1-67) provide no disclosure of the claimed features.

The dependent claims recite further features of the non-linkable media representation enriching technique of the invention. For example, the link canvas object may generate the panel,

wherein the panel displays range contours of the at least one link (claims 31 and 53). The link canvas object may perform a specified action (claims 32 and 54). The link canvas object may request a specified action to be performed (claims 33 and 55). The link canvas object may unify representations of multiple links (claims 34 and 56). The link canvas object may decouple at least one link from a linkable media representation (claims 35 and 57). The code may be obtained prior to the non-linkable media representation (claims 36 and 58). The non-linkable media representation may be obtained from a streaming media file (claims 37 and 59). The at least one link may be a hotlink (claims 38 and 60). The at least one link may be a hyperlink (claims 39 and 61).

Furthermore, the client station and the at least one server may be compatible with a HotMedia architecture (claims 40 and 62). The server may produce and transmit real time media presentations (claims 41 and 64). The server may provide a real-time encoding studio for transmitting both real-time non-linkable media and a set of meta information of hotlinks to a HotMedia client station (claims 42 and 65). The real-time encoding studio may provide a real-time authoring capability for multiplexing a non-linkable media and a set of meta information of hotlinks to a streaming rich media file in a HotMedia framework (claims 43 and 66).

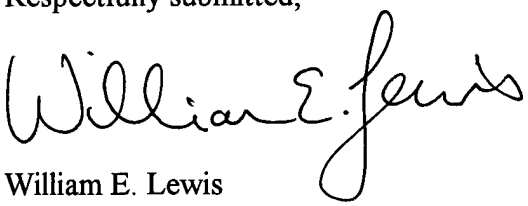
However, regarding the above-mentioned claims, the Office Action either cites a portion of Bates which is unrelated to these claimed features, or summarily states that the subject claims are "analyzed as previously discussed" with respect to other claims whose "analysis" does not mention any of the subject features.

For at least the above reasons, withdrawal of the §102(e) rejection of dependent claims 22-43, 45-62 and 64-66 is respectfully requested.

Applicants file concurrent herewith a Request for a Continued Prosecution Application (CPA). Applicants point out that the CPA status of this application precludes the use of Bates as a reference under 35 U.S.C. §103.

Applicants believe that claims 21-67 are in condition for allowance and, therefore, respectfully request favorable reconsideration.

Respectfully submitted,



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